

COMMENTS

Section and pg. number of April 29, 2005 Revised PMR	Page in Corrected Version	Comment
GLOBAL CHANGES		
All portions of the document.		Printed results may vary based upon the software applications used to open these documents.
All portions of the document.		All redlined text is either new or revised text or figures. Please assume that all redlined text is double underlined as well.
All portions of the document.		Inconsistent use of terminology - "waste characterization" instead of "waste analysis."
All portions of the document		Inconsistent use of terminology - "hazardous waste codes" instead of "hazardous waste numbers."
All portions of the document		Inconsistent use of terminology - "RH TRU waste" instead of "RH TRU mixed waste."
Primarily Attachment B2		Text failed to address the applicability of requirements to newly generated waste.
Primarily Attachment M1		Inconsistent use of terminology – "Parking Area Staging Area" instead of "Parking Area Staging Areas."
Primarily Attachments M1 and M2		Inconsistent use of terminology – "RH TRU 72B" instead of "RH-TRU 72-B."
Primarily Attachments M1 and M2		Inconsistent use of terminology – "6.25 ton grapple crane" instead of "6.25 Ton Grapple Crane."
REVISED PMR		
Section 1.2.1.1, 1 st paragraph, pg. 6	pg. 7	Reference to TSDF WAC should have read "II.C.3.a through II.C.3.h."
Section 1.2.5, first paragraph, pg. 13	pg. 14	Reference to "HWFP Section A-4a(1)" should have been "HWFP Section A-4a(2)."
311 COMMENT RESPONSE MATRIX		
Appendix I, paragraph before heading "Success in performing the waste analysis activity:", pg. 20	pg. 23	The references to the specific sections of Attachment B were incorrect – should have been "Attachment B, Section B-2."
Appendix I, last paragraph under the heading "Changes to the waste analysis	pg. 27	The references to the specific sections of Attachment B were incorrect – should

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activity proposed in the PMR:", pg. 23		have been "Attachment B, Section B-2."
MODULE I		
Table of Changes, entry I.A., pg. I-1	pg. I-1	There was no explanation for the proposed deletion of the word "manage" in the context of the proposed deletion of the RH prohibition.
Table of Changes, entry I.D.1.a., pg. I-1	pg. I-1	Wrong section designated – was "I.D.3.a." instead of "I.D.1.a."
Table of Changes, entry I.D.9, pg. I-1	pg. I-1	Word "examined" should have been "unexamined"
MODULE II		
Table of Changes, entry II.C.1.b, pg. II-2	pg. II-2	Table of Changes text was inconsistent with proposed permit text – didn't include complete quote referencing SW-846.
Table of Changes, entry II.C.1.c., pg. II-2	pg. II-2	Table of Changes text inconsistent with proposed permit text. Also, no explanation was provided in Table of Changes for proposed deletion of text from permit.
Table of Changes, entry II.C.1.e., pg. II-3	pg. II-3	Table of Changes text inconsistent with proposed permit text. Also, the explanation was missing the word "and." Also included a superfluous reference (i.e. "1.3).
Table of Changes, entry II.C.1.g., pg. II-3	pg. II-3	The Table of Changes text did not include the word "characterization" in connection with the reporting functions of the WWIS. Also change justification reference from "1.2.2.2" to 1.2.2"
Table of Changes, entry II.C.2.a., pg. II-4	pg. II-4	Table of Changes text included the wrong reference to the section of the HWFP dealing with audits.
Text, Section II.C.1.c., pg. II-2	pg. II-2	The proposed permit text did not include a deletion in reference to control charting. The word "radiography" should have been deleted.
MODULE III		
Table of Changes, entry III.A.2.c., pg. III-3	pg. III-4	Table of Changes text duplicated "Storage Time Limit" twice. The first listing should have been "Condition III.A.2.c, Prohibition on opening shipping containers."
Table of Changes, entry N/A, pg. N/A	pg. III-4	Table of Changes did not include an entry for the change at Section III.B.1 of the proposed permit text.

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Table of Changes, entry N/A, pg. N/A	pg. III-4	Table of Changes did not include an entry for the change at Section III.B.1.c. of the proposed permit text.
Table of Contents, pg.s. III-vi through vii	pg. III-I through II-ii	Incorrect titles were provided for Sections III.A.1.h., III.A.1.i., III.C.1.f., III.C.1.g., and III.G.2.
Module III.B.1., pg. III-5	pg. III-5	Proposed permit text did not include deletion of “and manage.”
Module III.B.2., pg. III-5	pg. III-5	Proposed permit text incorrectly added “and dispose.”
MODULE IV		
Table of Changes, entry for Table IV.A.1., pg. IV-1	pg. IV-1	Table of Changes explanation of change did not explain why Panels beyond Panel 3 were included in the table.
Table of Changes, entry IV.D.1., pg. IV-1	pg. IV-1	Proposed permit text quoted in Table of Changes didn’t include the plural words “rooms” and “panels”, and the explanation didn’t tell the reader where the justification for the proposed change waste located in the document.
Table IV.A.1, pg. IV-2	pg. IV-2	The total box at the bottom of the first column didn’t include a parenthetical indicating the totals applied to Panels 1, 2, and 3. The third column of the table did not include the correct number of RH canisters – should have been “730” instead of “750” canisters.
Section IV.D.1., first paragraph, pg. IV-4	pg. IV-4	Proposed permit text did not explicitly indicate that the monitoring applied to all active rooms and all closed rooms in active panels. Text included the word “an” before “active”.
Section IV.D.2., first paragraph, pg. IV-5	pg. IV-5	Proposed permit text did not include the word “confirm” in the first sentence.
ATTACHMENT A		
There were no clarifications identified in this attachment.		
ATTACHMENT B		
Attachment B, Table of Changes	pg. B-2	Table of Changes did not include a change proposed to the permit text under the heading “Introduction and Attachment Highlights.”
Table of Changes, third entry for Nonhalogenated Volatile Organic Compounds, pg. B-4	pg. B-5	The first column entry should have been designated “Introduction and Attachment Highlights”. Also, the quoted text cited the wrong section for the TSDF WAC provisions, and was inconsistent with the proposed permit text.

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Table of Changes, second entry for Nonhaogenated Volatile Organic Compounds, pg. B-4	pg. B-7	The first column entry should have been "Introduction and Attachment Highlights". Also, the text was inconsistent with the proposed permit text. This section's explanation also needed to be expanded.
Table of Changes, fourth entry for Nonhaogenated Volatile Organic Compounds, pg. B-5	pg. B-7	The first column entry should have been "Introduction and Attachment Highlights". Also, this change needed further explanation.
Table of Changes, first nine entries for B-2, pgs. B-9 through B-11	pg. B-12 through B-13	Explanations should have read "to move these Program-Level requirements" instead of "to remove these Program-Level requirements."
Table of Changes, fourth entry for B-2, pg. B-11	pg. B-14	Quoted permit text should have indicated that the determination only applied to applicable portions of the TSDF-WAC – not all portions.
Table of Changes, missing entry	pg. B-23	Table of Changes did not include an entry for the change proposed to B-3a(3).
Table of Changes, first entry for B-4a(2), pg. B-32	pg. B-40	Need more explanation of change in the context of redundant language in Attachment B3. Also, quoted permit text was not correct.
Table of Changes, entry N/A, pg. N/A	pg. B-41	Table of Changes did not include an entry for the change proposed to Section B-4a(6).
Table of Changes, first entry for B-4a(7), pg. B-32	pg. B-42	Proposed permit text was not clear regarding classified information.
Table of Changes, entry for References, pg. B-46	pg. B-60	Quoted permit text did not include references to applicable public law. Also, explanation section not specific enough.
Table of Changes, entry for Table B-1, pg. B-47	pg. B-61	Quoted permit text was not clear as to methods used to clarify hazardous waste numbers. Explanation was not clear.
Table of Changes, entry for Table B-3, pg. B-47	pg. B-62	Table of Changes text did not match proposed permit text. Also, explanation column did not full explain the proposed deletion.
Table of Changes, entry for Table B-6, pg. B-48	pg. B-63	Explanation was not clear regarding purpose of AK method.
Table of Changes, first entry for Table B-6, pg. B-49	pg. B-64	Explanation was not clear regarding purpose of AK method. Also quoted text did not match proposed permit text relative to double underline.
Table of Changes, entry for Table B-6, pg. B-50	pg. B-65	Explanation was not clear regarding purpose of AK method.

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Table of Changes, entry for Table B-6, pg. B-50	pg. B-65	Text was unclear as to the rationale for analysis of S3000 homogeneous solids and soils and gravels – word “verify” was misleading.
Table of Changes, entry for Table B-7, pg. B-50	pg. B-66	Explanation was unclear as to what lifetime records will be kept.
Text, Second to the last paragraph on pg. B-4	pg. B-4 through B-5	Proposed permit text was unclear as to analysis methods and reference to TSDF-WAC was incorrect. Also, the last sentence included an “a” before “NMED”, and the word “is” should have been “are.”
Text, third paragraph from the bottom, pg. B-6	pg. B-6	Text was unclear as to the Waste Analysis Information Summary and determination of no ignitable, corrosive or reactive waste. Also, the acronym “DQO” was not defined.
Text, Section B-1c, second to the last bullet, pg. B-8	pg. B-9	Text was not clear as to applicability to waste stream lots.
Text, Section B-2, first paragraph and first bullet, pg. B-12	pg. B-13	Text did not include “TRU mixed” after RH. First bullet of enumerated items was unclear as to applicability of TSDF-WAC.
Text, first paragraph under B-3d(1), pg. B-20	pg. B-22	Text not clear as to with what activities begin TRU mixed waste analysis.
Attachment B, Table B-1, pg. B-45	pg. B-47	Headspace gas analytes Formaldehyde and Hydrazine were unclear as to analytical methods used and their purpose.
Table B-7, pg. B-57	pg. B-60	The proposed permit text was unclear as to what lifetime records would be kept.
ATTACHMENT B1		
Table of Changes, entry N/A, pg. N/A	pg. B1-15	Table of changes did not include an entry reflecting proposed deletion on Table B1-4 related to PCBs because they are regulated by EPA, not NMED.
Text, Section B1-1a(1), pg. B1-4	pg. B1-4	There was an incorrect reference to section numbers addressing sampling custody. Correct section numbers had been incorrectly stricken.
Text, Table B1-6, pg. B1-41	pg. B1-41	Table contained Drum Age Criteria for waste matrix for which HSGSA is not applicable.
ATTACHMENT B2		
Attachment B2, Global		Text did not indicate the applicability of certain techniques to newly generated waste.

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Table of Changes, pg. B2-8	B2-10	Table of Changes pertaining to Section B2-1a did not reflect the addition of text needed "and newly generated".
Table of Changes, entry B2-1, pg. B2-9.	B2-10	Table of Changes pertaining to Section B2-1 (revised to B2-1a) was missing a reference to Section 1.2.1 of the PMR.
Table of Changes, entry B2-1b, pg. B2-9	B2-12	Table of Changes pertaining to Section B2-1b did not reference Section 1.2.1 of the PMR in the explanation of change.
Table of Changes, entry N/A, pg. NA	B2-16	Table of Changes did not reflect the changes to Figure B2-1.
ATTACHMENT B3		
Table of Changes, entry B3-9b(1), pg. B3-12	B3-14	Text did not reflect that the Site Project QA Officer responsibility's have been reassigned to the Site Project Manager.
Table of Changes, entry Section B3-9a(i), pg. B3-8	B3-10	Incorrect reference was listed as Section B3-10 instead of B3-2 through B3-8.
Table of Changes, entry Section B3-10, pg. B3-15	B3-18	Section B3-10 reflected in correct language relative to waste analysis.
Table of Changes, entry, Section B3-11(b)(2), pg. B-19	B3-22	Table of Changes did not denote part of the explanation of the change with was "Control charting is no longer the method of choice in the revised PMR.
Text, Section B3-11b(3), pg. B3-34 through B3-35	B3-35	Sentence beginning with "If a container was part of a composite..." was incorrectly stricken.
ATTACHMENT B4		
Table of Changes, entry B4-3d, pg. B4-10	B4-10	Text was needed to clarify requirement.
Section B4-3b, pg. B4-9	B4-9	Text had been incorrectly stricken regarding procedures for prohibited items.
ATTACHMENT B5		
There were no clarifications identified in this attachment.		

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ATTACHMENT B6		
There were no clarifications identified in this attachment.		
ATTACHMENT B7		
Text, pg. B7-5, Section B7-1a(3)	B7-5	Text incorrectly referenced Permit Attachment B4-2a instead of Conditions II.C.3.a through II.C.3.h.
Text, pg. B7-6, Section B7-1a(3)	B7-6	Text incorrectly referenced Table B-8 instead of the Permit Attachment O for the list of approved hazardous wastes.
Text, pg. B7-11, Section B7-1b(4)	B7-11	Incorrect reference to figure was provided. Figure referenced should have been Figure B7-3.
ATTACHMENT C		
There were no clarifications identified in this attachment.		
ATTACHMENT D		
Table of Changes, entry D-1b(1), pg. D-3	D-5	Text did not properly identify the storage options for RH TRU waste in the Hot Cell.
Table of Changes, entry D-1b(1), pg. D-3	D-5	Text did not identify that spacing of RH TRU trailers, as well as CH TRU mixed waste trailers will be inspected.
Table of Changes, entry D-1b(1), pg. D-5	D-6	Text did not identify that inspection will be performed in the TMF Staging Area.
ATTACHMENT E		
Table of Changes, entry E-1b, pg. E-1; Text Section E-1b, pg. E-1	E-1	Permit text unclear regarding applicable facility areas being discussed.
Table of Changes, entry E-2e, last bullet, pg. E-5; Text Section E-2e, pg. E-8	E-5	Table of Changes and text clarified discussion relative to pressure differentials required in WHB HVAC system to satisfy design safety standards.
ATTACHMENT F		
Table of Changes, first entry for F-1, pg. F-6	pg. F-8	The quoted permit text was unclear as to applicability to storage vs. staging areas.

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Table of Changes, entry F-4d, third paragraph, pg. F-8; Text Section F-4d, pg. F-10	pg. F-10; pg. F-10	Subheading "Control, Containment, and Correction of the Emergency" should have been "Control of Spills or Leaking or Punctured Containers of CH or RH TRU Mixed Waste".
Text section F-4d, last paragraph on pg. F-13	pg. F-13	Second to the last sentence should have started with "Every".
ATTACHMENT G		
There were no clarifications identified in this attachment.		
ATTACHMENT H		
There were no clarifications identified in this attachment.		
ATTACHMENT H1		
There were no clarifications identified in this attachment.		
ATTACHMENT H2		
There were no clarifications identified in this attachment.		
ATTACHMENT I		
Table of Changes, entry I-1, pg. I-1; Attachment I, Section I-1, pg. I-2	pg. I-1; pg. I-2	Table of Changes did not indicate text "the TMF Staging Area" which should have been added to Section I-1.
Table of Changes, entry I-1c, pg. I-1; Text Section I-1c, pg. I-4	pg. I-2; pg. I-4	Text "each" was needed before "panel" and "issued" should have been "is used".
ATTACHMENT J1		
There were no clarifications identified in this attachment.		
ATTACHMENT M		
Table of Changes, entry Introduction, pg. M-1	pg. M-1	Text referred to holding area and should have been "Staging."

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ATTACHMENT M1		
Table of Changes, entry M1-1c(1), pg. M1-3	pg. M1-3	Explanation of change discussing the use of the Overpack and Repair room was omitted.
Table of Changes, entry M1-1d, pg. M1-9	pg. M1-11	Explanation of change was missing text "with the approval of this PMR".
Table of Changes, entry M1-1d(2), pg. M1-11; Attachment M1, Section M1-1d(2), pg. M1-17	pg. M1-12; pg M1-19	Text "Each waste stream in each shipment will also undergo verification and examination to verify..." should have been "Each waste stream in each shipment will also undergo verification and examination to assure..."
Table of Changes, entry M1-1f(1), pg. M1-18	pg. M1-20	Section title should have read "Secondary Containment Requirements for the Indoor Storage and Staging Areas."
Table of Changes, entry M1-1f(1), pg. M1-18	pg. M1-21	Text "... (4,540 L), the volume of the largest single container, the configuration of all TDOPs in the storage area..." is inconsistent with the permit modification request redline/strikeout and should have read "... (4,540 L), the configuration of possible TDOPs in the storage area..."
Table of Changes, entry N/A, pg. N/A	pg. M1-21	A paragraph beginning with "The maximum volume of TRU mixed waste on facility pallets that will be stored in the WHB Staging Area..." was missing from the Table of Changes.
Table of Changes, entry M1-1f(1), pg. M1-18	pg. M1-22	Spaces were missing between paragraphs. The end of the paragraph beginning with "The maximum volume of TRU mixed waste that will be stored in the Transfer Cell..." was missing and should have read, "23.5 gal (8.90 L) is less than the volume of a single container of 235 gal (890 L); therefore, the larger volume is used for determining containment requirements. 235 gal (890 L) of waste x one percent liquids = 2.35 gal (8.9 L) of liquid needed for secondary containment."
Table of Changes, entry M1-1f(2), pg. M1-19	pg. M1-22	First subheading in section was inconsistent with permit modification request redline/strikeout and should not have included text ", Room 108 Storage Area".
Table of Changes, entry M1-1f(2), pg. M1-19	pg. M1-2	Text should not have included ", Room 108 Storage Area".
ATTACHMENT M2		
Table of Changes, entry M2-2b, pg.M2-3	pg. M2-3	Text reflected that 731 RH canisters would be emplaced in each panels instead of 730. Text required clarification and Figure numbers were incorrectly noted.

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ATTACHMENT N		
Attachment N, Global		The file containing the Table of Changes and proposed PMR text was converted between two word processing programs and the file was corrupted. This resulted in portions of the text being deleted completely or shown as strikeout, line numberings being deleted, dark highlighting applied to various text, and the word "air" being converted to the word "are."
Table of Changes, entry N-1b, pg. N-2; and text in Section N-1b, pg. N-2	pg. N-2; pg. N-2	Text contained a run-on sentence, needed to affirm that the monitoring also is performed in active rooms and panels, and was missing a reference.
Table of Changes, entry N-3c, pg. N-4; and text in Section N-3c, pg. N-4	pg. N-4; pg. N-4	In the Table of Changes, the phrase "(or equivalent)" was omitted when referring to the SUMMA® canister. In the proposed permit text it was included but not indicated as new text.
Table of Changes, entry N-3d(2), pg. N-5; and text in Section N-3d(2), pg. N-6	pg. N-5; pg. N-6	Reference to Permit Module "IV.F.2.h" should have been to "IV. F.2.g".
Table of Changes, entry N-4a, pg. N-6; and text in Section N-4a, pg. N-8	pg. N-6 and N-7	This added text was not previously identified in Table of Changes
Table of Changes, entry N-4a(1), pg. N-6 and text in Section N-4a(1), pg. N-8	pg. N-7; pg. N-8	The Table of Changes, did not identify that a SUMMA® equivalent was acceptable.
Table of Changes, entry N/A, pg. N/A; and text in Section N-4a(3); N/A	pg. N-6; pg. N-8	The Table of Changes did not identify the sample tubing description.
Table of Changes, entry N-4b, pg. N-9	pg. N-7; pg. N-9	The Table of Changes did not identify the sample tubing description.
Text, Section N-3a(2), pg. N-3	pg. N-3	Clarification text was missing in the bullet list on the monitoring process description.